

Seed Services

03-101-2  
P19

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Docket No. 03-101-2  
Regulatory Analysis and Development, PPD, APHIS  
Station 3C71  
River Road Unit 118  
Riverdale, MD 20737-1238

To Whom It May Concern:

**RE: Comment refers to Docket No. 03-101-2**

The Oregon Seed Certification Service provides a service to the public for the maintenance and increase of quality seed and propagating material. This service is provided to insure varietal purity and seed quality through review and retention of crop production records and a series of field and laboratory evaluations.

The Oregon Seed Certification Service provides for certification of grasses, legumes, grains, mint, potatoes, other miscellaneous crops, and forest tree reproductive material. For most seed crops, this involves an application for seedling inspection and review of records and cropping history, a crop inspection, the sampling of each seed lot after harvest and cleaning, testing of seed for quality evaluation, and final tagging of each seed bag to verify final certification.

The Oregon Seed Certification Service certified 226,507 acres of seed crops in 2003. This acreage represented 960 varieties of 51 different crop species. There were 922 seed growers, 375 seed warehouses, and 278 seed contractors involved in the Oregon Seed Certification Service process.

As part of the Animal and Plant Health Inspection Service Environmental Impact Statement Study for Docket No. 03-101-2, the Oregon State University Seed Services Program is providing a summary of Oregon Seed Certification Service certified production and quality evaluation document for crop years 2000 through 2003 for your information and records.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Schweitzer", written over a horizontal line.

Lee Schweitzer  
Director of Seed Services

Crop Production and Rank			Averages for Tested Samples				
2000 Crop	Acres Passed	Certification Acres %	Number tested	Pure seed	Other crop	Weed seed	Inert
Tall fescue	96,562	37%	2736	98.90%	0.14%	0.02%	0.81%
Perennial ryegrass	89,293	34%	3105	98.62%	0.01%	0.01%	1.35%
Kentucky bluegrass	11,315	4%	338	98.13%	0.04%	0.11%	1.72%
Chewings fescue	11,020	4%	334	98.84%	0.02%	0.05%	1.09%
Orchardgrass	8,659	3%	217	93.76%	0.40%	0.03%	5.51%
Red fescue	7,180	3%	199	98.48%	0.02%	0.16%	1.34%
Wheat	6,932	3%	47	99.72%	0.00%	0.00%	0.28%
Creeping bentgrass	5,894	2%	377	98.83%	0.02%	0.01%	1.15%
Rough bluegrass	5,254	2%	149	98.41%	0.20%	0.16%	1.16%
Hard fescue	4,949	2%	168	98.06%	0.05%	0.21%	1.54%
Annual ryegrass	3,113	1%	160	99.71%	0.00%	0.01%	0.28%
Colonial bentgrass	3,013	1%	161	98.26%	0.02%	0.22%	1.49%
Alfalfa	1,341	1%	3	99.91%	0.00%	0.00%	0.09%
Barley	1,037	0%	4	99.90%	0.00%	0.00%	0.10%

  

2001 Crop							
Tall fescue	107,944	42%	2812	98.93%	0.10%	0.01%	0.91%
Perennial ryegrass	75,972	30%	2097	98.55%	0.01%	0.01%	1.42%
Kentucky bluegrass	14,831	6%	320	98.27%	0.02%	0.04%	1.67%
Chewings fescue	9,178	4%	144	98.74%	0.01%	0.03%	1.22%
Red fescue	9,022	4%	93	98.54%	0.01%	0.11%	1.35%
Orchardgrass	8,321	3%	144	94.29%	0.24%	0.03%	5.40%
Wheat	5,207	2%	30	99.54%	0.08%	0.00%	0.37%
Hard fescue	4,832	2%	98	98.66%	0.01%	0.07%	1.26%
Creeping bentgrass	4,423	2%	98	99.01%	0.00%	0.00%	0.99%
Rough bluegrass	3,588	1%	85	98.80%	0.08%	0.03%	1.09%
Colonial bentgrass	3,449	1%	81	98.38%	0.02%	0.15%	1.44%
Annual ryegrass	2,356	1%	106	99.78%	0.01%	0.00%	0.21%

  

2002 Crop							
Tall fescue	115,398	47%	3101	98.93%	0.12%	0.01%	0.74%
Perennial ryegrass	62,833	26%	2077	98.42%	0.01%	0.01%	1.56%
Kentucky bluegrass	14,620	6%	403	98.21%	0.02%	0.03%	1.74%
Orchardgrass	9,725	4%	200	93.43%	0.37%	0.06%	5.52%
Wheat	8,669	4%	52	99.64%	0.01%	0.00%	0.36%
Red fescue	6,858	3%	72	98.48%	0.02%	0.08%	1.41%
Chewings fescue	5,784	2%	81	98.47%	0.03%	0.06%	1.18%
Colonial bentgrass	3,917	2%	78	98.78%	0.02%	0.12%	1.08%
Creeping bentgrass	3,414	1%	43	98.94%	0.00%	0.01%	1.05%
Hard fescue	2,963	1%	53	97.90%	0.02%	0.12%	1.96%
Annual ryegrass	2,526	1%	143	99.78%	0.01%	0.02%	0.19%
Rough bluegrass	1,946	1%	47	99.03%	0.06%	0.03%	0.88%
Oat	1,150	0%	11	99.91%	0.01%	0.00%	0.09%

  

2003 Crop							
Tall fescue	90,493	41%	2223	99.03%	0.10%	0.01%	0.80%
Perennial ryegrass	67,868	30%	2102	98.46%	0.02%	0.02%	1.48%
Kentucky bluegrass	13,644	6%	287	98.16%	0.02%	0.05%	1.77%
Wheat	11,543	5%	54	99.75%	0.00%	0.00%	0.25%
Orchardgrass	10,475	5%	153	93.46%	0.49%	0.06%	5.61%
Red fescue	5,114	2%	47	98.74%	0.00%	0.05%	1.21%
Colonial bentgrass	4,159	2%	103	98.38%	0.02%	0.11%	1.48%
Chewings fescue	3,764	2%	37	98.50%	0.01%	0.04%	1.45%
Creeping bentgrass	3,301	1%	19	98.33%	0.00%	0.00%	1.67%
Rough bluegrass	2,067	1%	71	99.03%	0.06%	0.03%	0.88%
Annual ryegrass	1,874	1%	65	99.62%	0.01%	0.05%	0.32%
Barley	1,017	0%	4	99.26%	0.01%	0.00%	0.74%

\*Values are listed for crops exceeding 1000 acres of certification production. Test data is derived from OSU Seed Laboratory evaluation of original certified samples representing Oregon production. Values for Perennial and Annual ryegrass are based on mechanical purity exam, and are not restated according to the fluorescence or grow-out results.

Data for 2000 as of 11/28/2001.

Data for 2001 as of 11/28/2001.

Data for 2002 as of 12/2/2002.

Data for 2003 as of 12/2/2003.

2000 Crop	Pure seed minimum	Samples	% for Crop	Other crop maximum	Samples	% for Crop	Weed seed maximum	Samples	% for Crop	Inert maximum	Samples	% for Crop
Tall fescue	98.00%	2479	90.6%	0.50%	2550	93.2%	0.30%	2718	99.3%	2.00%	2580	94.3%
Perennial ryegrass	97.00%	2933	94.5%	0.50%	3090	99.5%	0.50%	3094	99.6%	3.00%	2944	94.8%
Kentucky bluegrass	92.00%	334	98.8%	0.25%	324	95.9%	0.30%	319	94.4%	8.00%	335	99.1%
Chewings fescue	97.00%	321	96.1%	0.25%	329	98.5%	0.30%	324	97.0%	3.00%	326	97.6%
Orchardgrass	90.00%	202	93.1%	0.50%	172	79.3%	0.30%	214	98.6%	10.00%	210	96.8%
Red fescue	97.00%	186	93.5%	0.25%	195	98.0%	0.30%	174	87.4%	3.00%	189	95.0%
Wheat	98.00%	47	100.0%	0.05%	47	100.0%	0.03%	47	100.0%	2.00%	47	100.0%
Creeping bentgrass	98.00%	326	86.5%	0.50%	373	98.9%	0.25%	375	99.5%	2.00%	330	87.5%
Rough bluegrass	92.00%	148	99.3%	0.25%	121	81.2%	0.30%	126	84.6%	8.00%	149	100.0%
Hard fescue	97.00%	145	86.3%	0.25%	157	93.5%	0.30%	139	82.7%	3.00%	154	91.7%
Annual ryegrass	98.00%	158	98.8%	0.50%	160	100.0%	0.30%	159	99.4%	1.00%	158	98.8%
Colonial bentgrass	98.00%	127	78.9%	0.50%	160	99.4%	0.25%	126	78.3%	2.00%	129	80.1%
Alfalfa	99.00%	3	100.0%	0.25%	3	100.0%	0.25%	3	100.0%	1.00%	3	100.0%
Barley	98.00%	4	100.0%	0.05%	4	100.0%	0.03%	4	100.0%	2.00%	4	100.0%

2001 Crop	Pure seed minimum	Samples	% for Crop	Other crop maximum	Samples	% for Crop	Weed seed maximum	Samples	% for Crop	Inert maximum	Samples	% for Crop
Tall fescue	98.00%	2510	89.3%	0.50%	2685	95.5%	0.30%	2800	99.6%	2.00%	2599	92.4%
Perennial ryegrass	97.00%	1952	93.1%	0.50%	2094	99.9%	0.50%	2094	99.9%	3.00%	1956	93.3%
Kentucky bluegrass	92.00%	313	97.8%	0.25%	319	99.7%	0.30%	313	97.8%	8.00%	313	97.8%
Chewings fescue	97.00%	137	95.1%	0.25%	144	100.0%	0.30%	141	97.9%	3.00%	137	95.1%
Red fescue	97.00%	87	93.5%	0.25%	93	100.0%	0.30%	85	91.4%	3.00%	90	96.8%
Orchardgrass	90.00%	134	93.1%	0.50%	124	86.1%	0.30%	141	97.9%	10.00%	138	95.8%
Wheat	98.00%	30	100.0%	0.05%	26	86.7%	0.03%	29	96.7%	2.00%	30	100.0%
Hard fescue	97.00%	90	91.8%	0.25%	97	99.0%	0.30%	94	95.9%	3.00%	91	92.9%
Creeping bentgrass	98.00%	90	91.8%	0.50%	98	100.0%	0.25%	98	100.0%	2.00%	90	91.8%
Rough bluegrass	92.00%	85	100.0%	0.25%	76	89.4%	0.30%	85	100.0%	8.00%	85	100.0%
Colonial bentgrass	98.00%	66	81.5%	0.50%	81	100.0%	0.25%	68	84.0%	2.00%	69	85.2%
Annual ryegrass	99.00%	104	98.1%	0.50%	106	100.0%	0.30%	106	100.0%	1.00%	104	98.1%

2002 Crop	Pure seed minimum	Samples	% for Crop	Other crop maximum	Samples	% for Crop	Weed seed maximum	Samples	% for Crop	Inert maximum	Samples	% for Crop
Tall fescue	98.00%	2854	92.0%	0.50%	2926	94.4%	0.30%	3091	99.7%	2.00%	2968	95.7%
Perennial ryegrass	97.00%	1919	92.4%	0.50%	2075	99.9%	0.50%	2071	99.7%	3.00%	1925	92.7%
Kentucky bluegrass	92.00%	399	99.0%	0.25%	394	97.8%	0.30%	397	98.5%	8.00%	399	99.0%
Orchardgrass	90.00%	187	93.5%	0.50%	159	79.5%	0.30%	194	97.0%	10.00%	196	98.0%
Wheat	98.00%	51	98.1%	0.05%	51	98.1%	0.03%	52	100.0%	2.00%	51	98.1%
Red fescue	97.00%	67	93.1%	0.25%	71	98.6%	0.30%	65	90.3%	3.00%	67	93.1%
Chewings fescue	97.00%	76	93.8%	0.25%	80	98.8%	0.30%	79	97.5%	3.00%	78	96.3%
Colonial bentgrass	98.00%	67	85.9%	0.50%	77	98.7%	0.25%	69	88.5%	2.00%	68	87.2%
Creeping bentgrass	98.00%	38	88.4%	0.50%	43	100.0%	0.25%	43	100.0%	2.00%	38	88.4%
Hard fescue	97.00%	44	83.0%	0.25%	51	96.2%	0.30%	49	92.5%	3.00%	44	83.0%
Annual ryegrass	99.00%	140	97.9%	0.50%	141	98.6%	0.30%	142	99.3%	1.00%	142	99.3%
Rough bluegrass	92.00%	47	100.0%	0.25%	44	93.6%	0.30%	46	97.9%	8.00%	47	100.0%
Oat	98.00%	11	100.0%	0.05%	10	90.9%	0.03%	11	100.0%	2.00%	11	100.0%

2003 Crop	Pure seed minimum	Samples	% for Crop	Other crop maximum	Samples	% for Crop	Weed seed maximum	Samples	% for Crop	Inert maximum	Samples	% for Crop
Tall fescue	98.00%	2027	91.2%	0.50%	2118	95.3%	0.30%	2218	99.8%	2.00%	2098	94.4%
Perennial ryegrass	97.00%	1958	93.1%	0.50%	2076	98.8%	0.50%	2087	99.3%	3.00%	1977	94.1%
Kentucky bluegrass	92.00%	278	96.9%	0.25%	280	97.6%	0.30%	275	95.8%	5.00%	279	97.2%
Wheat	98.00%	54	100.0%	0.05%	54	100.0%	0.03%	54	100.0%	2.00%	54	100.0%
Orchardgrass	90.00%	140	91.5%	0.50%	110	71.9%	0.30%	145	94.8%	10.00%	148	96.7%
Red fescue	97.00%	45	95.7%	0.25%	47	100.0%	0.30%	45	95.7%	3.00%	45	95.7%
Colonial bentgrass	98.00%	77	74.8%	0.50%	102	99.0%	0.25%	92	89.3%	2.00%	82	79.6%
Chewings fescue	97.00%	34	91.9%	0.25%	36	97.3%	0.30%	36	97.3%	3.00%	34	91.9%
Creeping bentgrass	98.00%	13	68.4%	0.50%	19	100.0%	0.25%	19	100.0%	2.00%	13	68.4%
Rough bluegrass	92.00%	71	100.0%	0.25%	68	95.8%	0.30%	70	98.6%	5.00%	71	100.0%
Annual ryegrass	99.00%	60	92.3%	0.50%	65	100.0%	0.30%	62	95.4%	1.00%	62	95.4%
Barley	98.00%	4	100.0%	0.05%	4	100.0%	0.03%	4	100.0%	2.00%	4	100.0%

\*Values are listed for crops exceeding 1000 acres of certification production. Test data is derived from OSU Seed Laboratory evaluation of original certified samples representing Oregon production. Values for Perennial and Annual ryegrass are based on mechanical purity exam, and are not restated according to the fluorescence or grow-out results.

Data for 2000 as of 11/28/2001.

Data for 2001 as of 11/28/2001.

Data for 2002 as of 12/2/2002.

Data for 2003 as of 12/2/2003.

2000 Crop	Number tested	Prevalent Contaminant Seeds and Percentage of Samples									
		1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th
Tall fescue	2736	Ryegrass	39%	Annual bluegrass	8%	Orchardgrass	4%	Downy brome	3%	Curly dock	3%
Perennial ryegrass	3105	Annual ryegrass	63%	Annual bluegrass	9%	Rattail fescue	7%	Downy brome	4%	Fine fescue	2%
Kentucky bluegrass	338	Witchgrass	7%	Henbit	6%	Canada bluegrass	6%	Rattail fescue	5%	Rough bluegrass	5%
Chewings fescue	334	Rattail fescue	39%	Annual bluegrass	7%	Ryegrass	6%	Downy brome	3%	Field chamomile	2%
Orchardgrass	217	Ryegrass	55%	Annual bluegrass	35%	Tall fescue	30%	Curly dock	13%	Rough bluegrass	13%
Red fescue	199	Rattail fescue	43%	Downy brome	17%	Ryegrass	8%	Annual bluegrass	6%	Kentucky bluegrass	4%
Wheat	47	Oat	2%	Ryegrass	2%	Red wheat	2%	Wild radish	2%	not applicable	
Creeping bentgrass	377	Annual bluegrass	4%	Colonial bentgrass	2%	Kentucky bluegrass	2%	Western yellowcress	2%	Wild carrot	1%
Rough bluegrass	149	Kentucky bluegrass	37%	Windgrass	19%	Rattail fescue	18%	Henbit	6%	Foxtail	5%
Hard fescue	168	Rattail fescue	56%	Ryegrass	16%	Annual bluegrass	10%	Downy brome	4%	Kentucky bluegrass	2%
Annual ryegrass	160	Perennial ryegrass	31%	Annual bluegrass	16%	Rattail fescue	6%	Foxtail	2%	Ladysthumb	2%
Colonial bentgrass	161	Velvetgrass	31%	Foxtail	18%	Toad rush	18%	Annual bluegrass	13%	Silver hairgrass	13%
Alfalfa	3	--	--	--	--	--	--	--	--	--	--
Barley	4	--	--	--	--	--	--	--	--	--	--

  

2001											
Tall fescue	2812	Ryegrass	28%	Annual bluegrass	4%	Orchardgrass	3%	Downy brome	3%	Bedstraw	2%
Perennial ryegrass	2097	Annual ryegrass	65%	Annual bluegrass	7%	Rattail fescue	6%	Tall fescue	2%	Downy brome	2%
Kentucky bluegrass	320	Rough bluegrass	8%	Rattail fescue	5%	Lemmons alkaligrass	4%	Witchgrass	4%	Annual bluegrass	4%
Chewings fescue	144	Rattail fescue	31%	Ryegrass	5%	Annual bluegrass	3%	Downy brome	2%	Sedge	1%
Red fescue	93	Rattail fescue	46%	Downy brome	22%	Annual bluegrass	4%	Field pennycress	4%	Henbit	3%
Orchardgrass	144	Ryegrass	53%	Tall fescue	31%	Annual bluegrass	24%	Wild carrot	6%	Curly dock	6%
Wheat	30	Red wheat	17%	Downy brome	3%	Brassica sp.	3%	Shepherdspurse	3%	Kentucky bluegrass	3%
Hard fescue	98	Rattail fescue	48%	Ryegrass	6%	Downy brome	4%	Annual bluegrass	3%	Sedge	2%
Creeping bentgrass	98	Annual bluegrass	2%	Bedstraw	1%	Wild carrot	1%	Common plantain	1%	Sticky mouse-ear	1%
Rough bluegrass	85	Kentucky bluegrass	25%	Rattail fescue	15%	Windgrass	14%	Henbit	6%	Downy brome	6%
Colonial bentgrass	81	Sticky mouse-ear	26%	Velvetgrass	23%	Toad rush	15%	Rough bluegrass	15%	Silver hairgrass	10%
Annual ryegrass	106	Perennial ryegrass	32%	Burr chervil	7%	Annual bluegrass	5%	Foxtail	4%	Wild oat	3%

  

2002											
Tall fescue	3101	Ryegrass	34%	Annual bluegrass	6%	Orchardgrass	3%	Downy brome	2%	Hairy chess	2%
Perennial ryegrass	2077	Annual ryegrass	56%	Annual bluegrass	11%	Rattail fescue	7%	Fine fescue	3%	Tall fescue	2%
Kentucky bluegrass	403	Rough bluegrass	8%	Annual bluegrass	4%	Witchgrass	3%	Henbit	3%	Ryegrass	3%
Orchardgrass	200	Ryegrass	57%	Tall fescue	35%	Annual bluegrass	29%	Rough bluegrass	13%	Curly dock	10%
Wheat	52	Brassica sp.	12%	Oat	4%	Barley	2%	Ryegrass	2%	Barnyardgrass	2%
Red fescue	72	Rattail fescue	38%	Downy brome	17%	Ryegrass	10%	Annual bluegrass	6%	Bulbous bluegrass	4%
Chewings fescue	81	Rattail fescue	32%	Ryegrass	6%	Field chamomile	4%	Sedge	2%	Tall fescue	2%
Colonial bentgrass	78	Velvetgrass	14%	Western yellowcress	13%	Toad rush	10%	Rough bluegrass	9%	Speedwell	8%
Creeping bentgrass	43	Willowherb	2%	Wild carrot	2%	Shepherdspurse	2%	Annual bluegrass	2%	Common groundsel	2%
Hard fescue	53	Rattail fescue	45%	Ryegrass	15%	Annual bluegrass	13%	Spotted cat's-ear	9%	Sedge	6%
Annual ryegrass	143	Annual bluegrass	18%	Perennial ryegrass	17%	Rattail fescue	10%	Wild oat	4%	Tall fescue	3%
Rough bluegrass	47	Kentucky bluegrass	19%	Windgrass	6%	Rattail fescue	6%	Henbit	4%	Pigweed	2%
Oat	11	Wheat	9%	Wild radish	9%	Common wheat	9%	Wild buckwheat	9%	not applicable	

  

2003											
Tall fescue	2223	Ryegrass	34%	Annual bluegrass	5%	Hairy chess	3%	Orchardgrass	3%	Curly dock	2%
Perennial ryegrass	2102	Annual ryegrass	68%	Annual bluegrass	11%	Rattail fescue	8%	Fine fescue	4%	Tall fescue	3%
Kentucky bluegrass	287	Rattail fescue	13%	Rough bluegrass	7%	Henbit	4%	Witchgrass	3%	Downy brome	3%
Wheat	54	Bedstraw	4%	Ryegrass	2%	Downy brome	2%	Tall fescue	2%	--	--
Orchardgrass	153	Ryegrass	76%	Annual bluegrass	43%	Tall fescue	39%	Mountain brome	8%	Rough bluegrass	8%
Red fescue	47	Rattail fescue	47%	Ryegrass	9%	Downy brome	9%	Kentucky bluegrass	9%	Henbit	6%
Colonial bentgrass	103	Toad rush	37%	Velvetgrass	19%	Sticky mouse-ear	17%	Western yellowcress	16%	Rough bluegrass	9%
Chewings fescue	37	Rattail fescue	32%	Ryegrass	11%	Field chamomile	8%	Henbit	3%	Trefoil	3%
Creeping bentgrass	19	Annual bluegrass	16%	Willowherb	11%	Western yellowcress	11%	Common plantain	5%	Colonial bentgrass	5%
Rough bluegrass	71	Kentucky bluegrass	20%	Rattail fescue	14%	Windgrass	8%	Annual bluegrass	3%	Henbit	1%
Annual ryegrass	65	Perennial ryegrass	20%	Soft chess	8%	Tall fescue	8%	Toad rush	6%	Mannagrass	6%
Barley	4	Wheat	25%	--	--	--	--	--	--	--	--

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Data for 2000 as of 11/28/2001.

Data for 2001 as of 11/28/2001.

Data for 2002 as of 12/2/2002.

Data for 2003 as of 12/2/2003.

2000	Percentage of Samples
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Annual ryegrass	24.6%
Ryegrass	15.6%
Annual bluegrass	8.9%
Rattail fescue	8.2%
Downy brome	3.5%
Kentucky bluegrass	2.7%
Tall fescue	1.7%
Orchardgrass	1.7%
Curly dock	1.7%
Rough bluegrass	1.6%

2001	Percentage of Samples
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Annual ryegrass	21.8%
Ryegrass	14.3%
Rattail fescue	5.8%
Annual bluegrass	5.4%
Downy brome	2.7%
Kentucky bluegrass	1.6%
Bedstraw	1.6%
Orchardgrass	1.6%
Tall fescue	1.5%
Curly dock	1.1%

2002	Percentage of Samples
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Ryegrass	20.1%
Annual ryegrass	19.9%
Annual bluegrass	9.1%
Rattail fescue	5.5%
Downy brome	2.1%
Tall fescue	2.0%
Kentucky bluegrass	1.7%
Rough bluegrass	1.6%
Orchardgrass	1.6%
Fine fescue	1.5%

2003	Percentage of Samples
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Annual ryegrass	27.9%
Ryegrass	17.7%
Annual bluegrass	9.2%
Rattail fescue	6.1%
Tall fescue	2.6%
Hairy chess	2.2%
Fine fescue	2.1%
Downy brome	1.8%
Curly dock	1.4%
Rough bluegrass	1.3%

\* Test data is derived from OSU Seed Laboratory evaluation of original certified samples representing Oregon production.

Data for 2000 as of 11/28/2001.

Data for 2001 as of 11/28/2001.

Data for 2002 as of 12/2/2002.

Data for 2003 as of 12/2/2003.